

Minutes for Rule 21 Working Group Meeting #71
November 16, 2005
San Diego Gas & Electric
San Diego, CA

There were 22 Working Group members in attendance in person or conferenced in by telephone. The next regular meeting of the Working Group is scheduled for Wednesday, December 14, at PG&E in San Francisco.

David Michel, Chair

Aldridge	Pat	SCE	Luke	Robin	RealEnergy
Bantz	Tom	UTC Power	Manzuk	Chuck	SDG&E
Blair	Tom	City of SD	Mazur	Mike	3 Phase Ergy Serv
Blumer	Werner	CPUC/ED	McAuley	Art	PG&E
Brown	David	SMUD	Monson	William	MRW & Assoc.
Couts	George	SCE	Parks	Ken	SDG&E
Dean	Amber	SCE	Prabhu	Edan	Reflective Ergies
Dixon	John	SDG&E	Sheriff	Nora	CAC/EPUC
Edds	Michael	DG Ergy Sol	Skillman	Fred	PG&E
Goh	Jeff	PG&E	Solt	Chuck	Lindh & Assoc
Iammarino	Mike	SDG&E	Torribio	Gerome	SCE
Jackson	Jerry	PG&E	Tunnicliff	Dan	SCE
Lacy	Scott	SCE	Vaziri	Moh	PG&E

Combined Process and Technical Group

Utility DG Activity Reports

The October report from SDG&E was posted before the meeting. PG&E provided reports for the first 3 quarters of 2005. SCE indicated that its October report will be available in a few days.

Rule 21 Revisions Advice Letter on Certification

Final wording was agreed to for the Rule 21 revision to make the certification compliance date consistent with IEEE 1547. In addition, it was agreed that this Advice Letter filing should also correct a typo in section D.1.a 2). The lower frequency tolerance should have been 59.3, but was inadvertently shown as 59.7. The revised language will be sent out to the group.

These Advice Letters must be filed by the utilities by November 21 in order to be effective by the end of the year. That will avoid the conflict with IEEE 1547.

Decision D.05-08-013 on DG OIR (R.04.03.017) Interconnection Issues

The deadline for utilities to file Advice Letters incorporating the recent CPUC decision is February 25, 2006.

Most of the meeting was spent addressing the issue of allocating export from combined NEM and Non-NEM systems. There were a number of attempts to identify all of the alternative methods that can be used to accommodate export from combined technology systems. Presentations were made by Jerry Jackson identifying 4 approaches. He will provide one-line diagrams and a write up on these alternatives before the next meeting. Tom Blair provided information on his project as an example. The information is available on the Rule 21 web site. Gerry Torribio discussed an alternative he refers to as “physics”.

So far the alternatives boil down to 3 basic approaches:

- “Stacking” – This approach would allow combined technology systems to receive credit against imported power for the total annual energy generated by the qualifying NEM unit.
- “Pro-Rata” – where an estimating factor is developed using unit ratings and capacity factors to allocate export to the qualifying and non-qualifying based on the production capacity of each. The qualifying export would be credited against purchases and the non-qualifying would be uncompensated.
- “Physics” – Gerry Torribio will provide more details about this approach.

It appears that the PUC and DG industry members favor the stacking approach and the utilities favor Pro-Rata. Werner Blumer argued on behalf of the Stacking approach citing PU Code §2827. Tom Blair was requested to provide hypothetical bills considering each of the scenarios by which power export provides a credit to the NEM meter. Tom said that without TOU or interval metering, it would be difficult for him to create hypothetical bills; he lacks the TOU metering data needed.

Robin Luke expressed concern that the most recent draft of Model Rule 21 updates had not been consented to by RealEnergy. Also that RealEnergy’s language changes to Sections E2 and G4 were not adequately posted on the Rule 21 website. Edan Prabhu stated that the Model Rule 21 circulated was the one that was marked up while displayed on the screen at the previous meeting and those present at the meeting had agreed that the language was acceptable for the next draft. Edan apologized for the error in posting RealEnergy’s mark-up to the Internet. Robin’s mark-up was retrieved during the meeting and discussed. Each utility agreed to consider the proposed RealEnergy changes and respond by the next meeting.

F.3 and F.4 language proposed by Nora Sheriff was inadvertently omitted from the last draft of the Model Rule. Nora’s proposed language is included in draft 4..

A discussion related to allocation of fees and costs for multiple technologies was deferred until the next meeting.

PG&E raised a question about the format for its DG status report. It was decided that an entire future meeting would be dedicated to reports, and PG&E’s question would be addressed at that time.

Breakout Group

Since this meeting was primarily to develop the WG response to the Decision, there was no breakout group meeting.

Assignments

The following tasks were assigned:

- Chuck Solt – Provide utilities with certification update language for the Advice Letters by close of business Nov. 17.

- Jerry Jackson – Before the next meeting, provide one-line diagrams for alternatives A, B, C and D for combined technology systems with both NEM and Non-NEM generation.
- Gerry Torribio – Before the next meeting, provide an interactive Excel spreadsheet showing the “Physics” alternative, aka alternate E..
- Pat Aldridge – ASAP, provide SCE’s alternative wording for F.3 and F.4.
- Nora Sheriff – ASAP, provide CAC/EPUC alternative wording for F.3
- Chuck Solt – Clean up the latest draft working document and insert the above suggested F.3 paragraphs from Pat and Nora and also the one previously suggested by Werner. The working document will have 4 paragraphs F.3, each identified with its author.
- Gerry and Jerry will resolve the “Physics” column in Jerry Jackson’s spreadsheet tabulating the alternatives and provide the revised sheet to the group.
- Chuck Solt – Assemble a single package of documents including the schematics, spreadsheets and distribute to the WG.
- All 3 utilities – respond to Robin Luke’s suggested wording in paragraphs E.2.a and G.4.
- Gerry Torribio – With Scott Lacy’s assistance, take a first stab at identifying the approximate costs of studies related to the scenarios A,B,C,D, and E above, and provide the data to the WG.
- Utilities and others who are interested: Provide draft language on changes to Rule 21 for combined technologies; consider what tariff changes may be needed.

Submitted by: Chuck Solt

Approved by: Edan Prabhu